



May 4, 2007

The Honorable Charles L. A. Terreni
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: **Docket No. 2005-385-E - Petition of the Office of Regulatory Staff to Establish Dockets to Consider Implementing the Requirements of Section 1251 (Net Metering and Additional Standards) of the Energy Policy Act of 2005 - PEC's Motion for Prehearing Conference and Response to the Motion of Pamela Greenlaw**

Dear Mr. Terreni:

Enclosed for filing in the above referenced docket is PEC's Motion for Prehearing Conference and Response to the Motion of Pamela Greenlaw.

All Parties of Record have been served with this Motion on even date. If you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Len S. Anthony

Len S. Anthony
Deputy General Counsel – Regulatory Affairs

LSA:mhm

Enclosure

cc: Parties of Record

249198

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-385-E

Petition of the Office of Regulatory Staff to
Establish Dockets to Consider
Implementing the Requirements of Section
1251 (Net Metering) of the Energy Policy
Act of 2005

**PROGRESS ENERGY CAROLINAS,
INC.'S MOTION FOR PREHEARING
CONFERENCE AND RESPONSE TO THE
MOTION OF PAMELA GREENLAW**

Pursuant to the Public Service Commission of South Carolina ("the Commission") Rules 103-819, 103-820, 103-829 and 103-839, Carolina Power & Light Company, d/b/a Progress Energy Carolinas, Inc. ("PEC") moves the Commission to schedule a prehearing conference in this docket to simplify and stipulate issues in this proceeding. Included in this pleading is also PEC's Response to the Motion of Pamela Greenlaw to limit this proceeding to whether the Commission should adopt some form of net metering, and, if the Commission elects to do so, establish a separate proceeding in which to evaluate the appropriate net metering model. In support thereof, PEC shows the following:

1. PEC is an electric utility, generating, transmitting, distributing, and selling electric power in the state of South Carolina, subject to the jurisdiction of this Commission. PEC is a North Carolina Corporation, domesticated to conduct and conducting business within the state of South Carolina.

2. The attorney authorized to receive communications and pleadings relevant to this Motion is:

Len S. Anthony
Deputy General Counsel
P. O. Box 1551
410 South Wilmington Street
Raleigh, North Carolina 27602
Telephone: (919) 546-6367

3. This docket is somewhat unusual given the number of lay witnesses submitting testimony. Fundamentally, each of these witnesses is making the same recommendation to the Commission, i.e., adopt some form of net metering. The other parties to this proceeding, the utilities and the Office of Regulatory Staff (“ORS”), have indicated they are not opposed to the Commission adopting net metering, provided the Commission takes all appropriate steps to minimize the subsidization of net metering customers by the remaining utility customer body.

4. A prehearing conference could easily result in the stipulation of a number of issues and shorten the hearing. Thus, a prehearing conference should be a productive activity.

5. Turning to Pamela Greenlaw’s Motion to Establish a Separate Proceeding to address the type of net metering model to be adopted, if the Commission decides to allow net metering, such a separation is not needed and would constitute an inefficient use of the Commission’s resources.

6. Notice that the Commission had initiated a proceeding to consider whether the electric utilities of South Carolina should be required to provide net metering services was thoroughly published throughout the State. As evidenced by the numerous comments that have been filed and parties that have intervened in this proceeding, the public notice was effective and interested parties have contacted the Commission to present their views. Any party interested in net metering knows that this is the proceeding in which such parties can and should present their

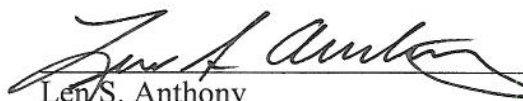
views regarding the proper net metering model to be adopted by the Commission. The subject matter of this proceeding is not limited to simply a generic question to be answered "yes" or "no" as to whether the Commission should allow net metering in South Carolina. Rather, as evidenced by the public notice and the Commission's Orders in this proceeding, the subject matter of this proceeding includes a consideration of the proper net metering model to be adopted by the Commission if it decides net metering is in the public interest.

7. Therefore, to schedule and allow such a separate proceeding as proposed by Ms. Greenlaw would be a waste of the Commission's, and the other parties' to this proceeding, resources, and should be denied.

WHEREFORE, PEC moves the Commission to establish a prehearing conference and deny Pamela Greenlaw's Motion to Establish Separate Proceedings.

Respectfully submitted this the 4th day of May, 2007.

PROGRESS ENERGY CAROLINAS, INC.



Len S. Anthony
Deputy General Counsel
Post Office Box 1551
Raleigh, North Carolina 27602
Telephone: (919) 546-6367

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-385-E

Petition of the Office of Regulatory Staff to Establish Dockets to Consider Implementing the Requirements of Section 1251 (Net Metering) of the Energy Policy Act of 2005)))))	PROGRESS ENERGY CAROLINAS, INC.'S MOTION FOR PREHEARING CONFERENCE AND RESPONSE TO THE MOTION OF PAMELA GREENLAW
---	-----------------------	---

I, Len S. Anthony, hereby certify that I have placed copies of PEC's Motion for Prehearing Conference and Response to the Motion of Pamela Greenlaw in the U. S. Mail on this date, to the parties of record at the addresses shown below, with sufficient postage attached:

Nanette Edwards, Esquire
Office of Regulatory staff
1441 Main Street, Suite 300
Columbia, South Carolina 29201

Shannon Bowyer Hudson, Esquire
Office of Regulatory staff
1441 Main Street, Suite 300
Columbia, South Carolina 29201

Lawrence B. Somers
Associate General Counsel
Duke Energy Corporation
Post Office Box 1244, PB05E
Charlotte, North Carolina 28201

Richard L. Whitt, Esquire
Austin, Lewis & Rogers, P.A.
Post Office Box 11716
Columbia, South Carolina 29211

Catherine E. Heigel, Counsel
Duke Energy Carolinas, LLC
Post Office Box 1006, EC03T
Charlotte, NC, 28201-1066

John F. Hardaway, Attorney at Law
John F. Hardaway
1338 Pickens Street
Columbia, SC, 29201

Mel Jenkins
Mel Jenkins
3324 Montgomery Avenue
Columbia, SC, 29205

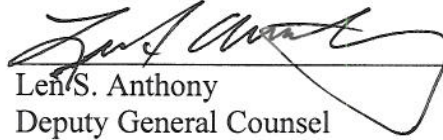
Pamela Greenlaw
1001 Wotan Road
Columbia, SC, 29229

Ruth Thomas
1339 Sinkler Road
Columbia, SC 29206

Catherine D Taylor, Senior Counsel
South Carolina Electric and Gas
Company
1426 Main Street, M/C 130
Columbia, SC 29201

K. Chad Burgess, Counsel
South Carolina Electric and Gas Company
1426 Main Street, MC 130
Columbia, SC 29201

This the 4th day of May, 2007.



Len S. Anthony
Deputy General Counsel